

State Library of Iowa

REPLY

Thank you for the opportunity to reply to comments on the Proposed Rule Making on the federal E-Rate Program. The State Library of Iowa thanks the Federal Communications Commission for its ongoing commitment to expand the universal service of telecommunications services by supporting the Universal Service Program for Schools and Libraries. The e-rate has assisted Iowa's libraries. We have seen progress over the five years and seen the system become less complicated. FCC has ongoing commitment to expand universal service and ask for input. The program's primary purpose needs to remain with the poorest and most remote schools and libraries.

The State Library of Iowa supports the E-Rate program as a means to bring Iowa libraries support for ongoing telecommunications and internet costs. Support with consultants in state/training.

We offer these replies to better serve schools and libraries and assist the SLD in better administration of the program.

We support the issues proposed by ALA and Colorado Department of Education and Iowa Department of Education

Issues:

Number of Iowa libraries

Iowa libraries rely heavily on training and support by consultants in 7 library service areas, with two consultants actually filling for their libraries. Statewide coordinator at State Library

Agree with ALA positions:

Allowing libraries to establish their discount levels by referring to an alternative to the school lunch program mechanism

Relying on the school lunch program to set a library's discount level is unfair to libraries.

ALA - completely agree. The rules require a library to apply based on the average school lunch data for the school district in which it is located, even though the specific area served by the library may be in a low income area. Smaller libraries may receive less funding than the specific area dictates. Libraries often find it difficult to get access to ready school lunch data. In Iowa, most libraries use data year old, because that is what is available to them. Agree with ALA stand that libraries be permitted to base discount level either on school lunch data for nearest school, on census data or other system, just as schools are given alternative methods to base discounts on.

Increasing the funding cap

Inefficient funds don't allow Iowa libraries to do internal connections

Digital divide

Most costly

School districts get more money in Iowa

Small libraries don't have support/staff; they could use it the most to get high speed internet

Eligible services - list posted good, maybe more explanation - some new items added that only PIA know - have separate notebooks. some notebooks have part numbers per vendor what is ok, what is not. Newer technology, new part not covered; computer online list; how would it be kept up to date. What about early applicants; newer technology comes along when they are implementing

Modifying the categories of eligible services to help streamline the application and review process

Revising the priority schedule for discount eligibility to accord with the modification of the eligible services categories.

Eliminating disincentives for consortia

Eligible services - keep up with technology - wireless

FCC intent probably when new technology became available, it should be discounted.

ALA roll money over to next year. Unused funds could fund appeals.

ALA streamline the application process and improve efficiency of program. Number one priority. Less overhead for staff to get more money for funding. Phone and internet year after year should be easy process. Speed up process. Fill out forms so far in advance. Libraries get confused. Don't get commitment letters till way after the July 1 start date of funding year.

Postmark vs. received date confusion

Appeals process

Mistake no turning back or correcting

Difficulty - % didn't apply after 1st year.

Vendor 470 bid process - only one option

Vendor discount practices - very confusing - not clear cut. Many libraries bills paid by city government, hard to track, may never be received by library, discounted to library. If billed entity and the applicant are two different bodies, the applicant and billed entity should indicated to who payment should be issued.

Too complicated process, give applicants more authority to check problems or make process simpler

Help with tools to statewide coordinators to followup on problems

Definitely subsidize training efforts of state coordinators for travel and seminar costs.

E-Rate has provided assistance to libraries in Iowa, but small %.

Libraries busy providing service and the way Iowans use their libraries has changed. More demands for service. Confusing is this covered, is this service not covered. Have to use what is available.

Additional funding for internal connections,
Compliance with the Americans with Disabilities Act
Libraries are already required to comply with the Americans with Disabilities Act. Why require a certification process to this program. Unnecessary paperwork.